

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-CR-80182-ROSENBERG

UNITED STATES OF AMERICA

vs.

DAVID SHTEINBERG,

Defendant.

MOTION FOR REDUCTION OF SENTENCE PURSUANT TO U.S.S.G. § 5K1.1

Pursuant to U.S.S.G. § 5K1.1 and 18 U.S.C. § 3553(e), the United States of America hereby moves for a downward departure from the Sentencing Guideline Range applicable to the defendant, David Shteinberg (“Shteinberg” or “Defendant”), in order to reflect his substantial assistance. In support of this motion, the Government states as follows:

1. The defendant entered a plea of guilty to conspiracy to possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(a)(1) and 846, and possession with intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 841(a)(1).

2. Shteinberg is currently set for sentencing on June 28, 2024.

3. The defendant has provided information related to a crystal methamphetamine distributor that substantially furthered a DEA investigation and led to the eventual conviction of the distributor. The United States will provide specific information about the nature of defendant's cooperation at the defendant's sentencing hearing.

4. Based on the defendant's substantial assistance, the United States respectfully moves this Court for a 33% reduction in the Defendant's sentence pursuant to U.S.S.G. § 5K1.1.

Respectfully submitted,

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s/Brian D. Ralston

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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Brian Ralston
BRIAN D. RALSTON
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SERVICE LIST

United States of America v. Williams, et al.
Case No. 23-CR-80182-RLR
United States District Court, Southern District of Florida

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